

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

ANATOLIE STATI; GABRIEL STATI;
ASCOM GROUP, S.A.; TERRA RAF
TRANS TRADING LTD.,

Petitioners,

v.

REPUBLIC OF KAZAKHSTAN,

Respondent.

Civil Action No. 1:14-cv-1638-ABJ

RESPONDENT REPUBLIC OF KAZAKHSTAN'S
OPPOSITION TO PETITION TO CONFIRM ARBITRAL AWARD

EXHIBIT 2



ARBITRATION INSTITUTE OF THE STOCKHOLM CHAMBER OF COMMERCE
WORLDWIDE DISPUTE RESOLUTION SERVICES

Stockholm, 5 August 2010

The Republic of Kazakhstan

Att: Ministry of Justice of the Republic of
Kazakhstan
House of the Ministries
Entrance 13
010000 Astana
Kazakhstan

By courier

The Arbitration Institute of the Stockholm Chamber of Commerce	
2010-08-05	
Arbitration No.	116/2010
Doc. No.	7

Arbitration V (116/2010): 1. Anatolie Stati 2. Gabriel Stati 3. Ascom Group S.A 4. Terra Raf Trans Traiding Ltd. ./ The Republic of Kazakhstan

Anatolie Stati, Gabriel Stati, Ascom Group S.A and Terra Raf Trans Traiding Ltd. have commenced arbitration in accordance with the Arbitration Rules of the Arbitration Institute of the Stockholm Chamber of Commerce (the Arbitration Rules).

In accordance with Article 5 of the SCC Rules, you are requested to submit an Answer to the SCC, by 26 August 2010 at the latest.

Your Answer shall contain comment on the seat of arbitration and on the proposition of the Claimants that the Chairperson be selected by the party-appointed arbitrators.

The Answer may be brief.

Where appropriate, you shall also submit to the SCC a Power of Attorney for your counsel.

Yours sincerely,

ARBITRATION INSTITUTE OF THE
STOCKHOLM CHAMBER OF COMMERCE

Natalia Petrik
Legal Counsel
natalia.petrik@chamber.se

Copy: Reginald R. Smith
Kenneth R. Fleuriot
Adrian Bulboaca



ARBITRATION INSTITUTE OF THE STOCKHOLM CHAMBER OF COMMERCE
WORLDWIDE DISPUTE RESOLUTION SERVICES

Encl: Request for Arbitration
Arbitration Rules



ARBITRATION INSTITUTE OF THE STOCKHOLM CHAMBER OF COMMERCE
WORLDWIDE DISPUTE RESOLUTION SERVICES

Stockholm, 5 August 2010

The case has been registered as

Arbitration V (116/2010): 1. Anatolie Stati 2. Gabriel Stati 3. Ascom Group S.A 4. terra Raf Trans Traiding Ltd. ./ The Republic of Kazakhstan

The following persons at the SCC Secretariat will administer the case.

Natalia Petrik

Legal Counsel
natalia.petrik@chamber.se
Dir.tel: +46 8 555 100 58

Christina Franzén-Papazov

Assistant
Christina.franzen-papazov@chamber.se
Dir.tel: +46 8 555 100 51

Should you have any questions concerning the case or otherwise regarding the activities of the SCC, please do not hesitate to contact us.

Mall	Office	Telephone	Telefax	E-mail	Internet:
P.O.Box 16050 S-103 21 Stockholm Sweden	Jakobs Torg 3 Stockholm Sweden	+46 8 555 100 50	+46 8 566 316 50	arbitration@chamber.se	http://www.chamber.se

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

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EXHIBIT 3

Track this shipment: <http://www.dhl.com>

Shipment Waybill (Non negotiable)

29 3137 2452 08/09
STO ORIGIN

1 Payer account number and insurance details

Change to ☐ Shipper ☐ Receiver ☐ 3rd party ☐ Cash ☐ Cheque ☐ Credit Card

Payer Account No. _____

Shipment Insurance see reverse ☐ Yes ☐ Insured value _____ Not all payment methods are available in all countries. CC reference code _____

2 From (Shipper)

Shipper's account number 200540896 Contact name Maria Cinkul

Shipper's reference (up to 32 characters - first 12 will be shown on invoice) 11672010

Company name STOCKHOLMS HANDELSKAMMARE

Address SERVICE AB JAKOBS TORO 3
STOCKHOLM
SWEDEN

Postcode/Zip Code (required) SE-111 53 Phone, Fax or E-mail (required) +46 (0)8 5530000

3 To (Receiver)

Company name The Republic of Kazakhstan

Delivery address (DHL cannot deliver to a PO Box)
At: Ministry of Justice of the
Republic of Kazakhstan
House of the Ministries
Entrance 13, 010000 Astana

Postcode/Zip Code (required) 010000 Country Kazakhstan

Contact person +7 7172 740737 Phone, Fax or E-mail (required) 7172 740737

4 Shipment details *Billed weight is calculated from total weight and dimensions*

Total number of packages 1 Total Weight 5.0 kg

Pieces Dimensions in cm

	Length	Width	Height
1	20	20	20

5 Full description of contents Give content and quantity

Doc.

6 Non-Document Shipments Only (Customs Requirement) Attach the original and two copies of a Proforma or Commercial Invoice

Shipper's VAT/GST number _____ Receiver's VAT/GST or Shipper's EIN/SSN _____

Declared Value for Customs (as on commercial/proforma invoice) _____ Harmonised Commodity Code if applicable _____

7 Shipper's agreement (Signature required) Unless otherwise agreed in writing, I/we agree that DHL's terms and Conditions of Carriage are all the terms of the contract between me/us and DHL, and I/we accept DHL's liability for loss, damage or delay and (2) this shipment does not contain cash or dangerous goods (see reverse).

Signature M. Cinkul Date 10/08/05

PT08/09 F30 SEE MAP

8 Products & Services

☐ Domestic ☒ International Document

☐ European Union ☐ International Non-Document

Products (not all are available to and from all locations)

☐ EXPRESS 9100 ☐ EXPRESS 1030 ☐ EXPRESS 1200 ☐ EXPRESS /WORLDWIDE

☐ ECONOMY SELECT ☐ EXPRESS ENVELOPE

Optional Services (extra charges may apply)

☐ Saturday Delivery ☐ Non-standard Pickup ☐ Delivery Notification ☐ Payable Packaging ☐ Non-standard Shipment ☐ Other _____

Global Mail Business ☐ Priority ☐ Standard ☐ Other _____

9 DIMENSIONAL/CHARGEABLE WEIGHT

kg _____ gr _____

CHARGES

Services _____ Other _____ Insurance _____ VAT _____

CURRENCY TOTAL

PAYMENT DETAILS (Cheque, Card No.)

No. : _____ Type _____ Expires _____

Picked up by _____ Route No. _____ Time _____ Date 5/8

Shipper's copy/Receipt



Sve

[Express](#) [Logistics](#) [Mail](#) [Press](#) [Karriär](#) [Om DHL](#)> DHL Sverige | > Express | **Spåra**

Spåra DHL Express-försändelser

DHL:s onlineverktyg för godssökning är det snabbaste sättet att ta reda på var din försändelse befinner sig. Du behöver inte ringa kundservice – vi ger dig detaljerad information på webben om var i DHL:s nätverk din försändelse finns på vägen mot destination.

Express

[Skicka](#)**[Spåra](#)**[Övervaka försändelser](#)[Vanliga frågor om godssökning](#)[Spåra med avsändarens referensnummer](#)[Fler godssökningsverktyg](#)[Exporttjänster](#)[Importtjänster](#)[Inrikestjänster](#)[Tillvalstjänster](#)[Industry Solutions](#)[Infocenter](#)[Bookmark Us](#)

Sökresultat

Fraktsedelsnummer: 2931372452**måndag, Augusti 09, 2010 k****Underskriven av: IIBRAEVA****Avsändarområde: > ARLAND****Destinationsområde: > ASTA****måndag, Augusti 09, 2010****Ort**

20	Försändelsen levererad, mottagen av : IIBRAEVA	ASTANA - KAZAKHSTAN
19	Ute för leverans med kurir	ASTANA - KAZAKHSTAN
18	Anlänt till DHLs leveranskontor i ASTANA - KAZAKHSTAN	ASTANA - KAZAKHSTAN

lördag, Augusti 07, 2010**Ort**

17	Lämnat DHLs station i ALMATY - KAZAKHSTAN	ALMATY - KAZAKHSTAN
16	Hanterad i ALMATY - KAZAKHSTAN	ALMATY - KAZAKHSTAN
15	Tullbehandling klar på ALMATY - KAZAKHSTAN	ALMATY - KAZAKHSTAN
14	Försenad vid klarering	ALMATY - KAZAKHSTAN
13	Anlänt till DHLs sortering i ALMATY - KAZAKHSTAN	ALMATY - KAZAKHSTAN

fredag, Augusti 06, 2010**Ort**

12	Lämnat DHLs station i AMSTERDAM - NETHERLANDS, THE	AMSTERDAM - NETHERLANDS, THE
11	Hanterad i AMSTERDAM - NETHERLANDS, THE	AMSTERDAM - NETHERLANDS, THE
10	Anlänt till DHLs sortering i AMSTERDAM - NETHERLANDS, THE	AMSTERDAM - NETHERLANDS, THE
9	Lämnat DHLs station i LEIPZIG - GERMANY	LEIPZIG - GERMANY
8	Hanterad i LEIPZIG - GERMANY	LEIPZIG - GERMANY
7	Anlänt till DHLs sortering i LEIPZIG - GERMANY	LEIPZIG - GERMANY

torsdag, Augusti 05, 2010**Ort**

6	Lämnat DHLs station i ARLANDA - SWEDEN	ARLANDA - SWEDEN
5	Hanterad i ARLANDA - SWEDEN	ARLANDA - SWEDEN
4	Anlänt till DHLs sortering i ARLANDA - SWEDEN	ARLANDA - SWEDEN
3	Lämnat DHLs station i STOCKHOLM - SWEDEN	STOCKHOLM - SWEDEN
2	Hanterad i STOCKHOLM - SWEDEN	STOCKHOLM - SWEDEN
1	Försändelse hämtad	ARLANDA - SWEDEN

Dölj detaljerade uppgifter**Prova att spåra igen**

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V.

Civil Action No. 1:14-cv-1638-ABJ

REPUBLIC OF KAZAKHSTAN,

Respondent.

**RESPONDENT REPUBLIC OF KAZAKHSTAN'S
OPPOSITION TO PETITION TO CONFIRM ARBITRAL AWARD**

EXHIBIT 4



ARBITRATION INSTITUTE
OF THE STOCKHOLM CHAMBER OF COMMERCE

Stockholm, 27 August 2010

The Republic of Kazakhstan

Att: Ministry of Justice of the Republic
of Kazakhstan
House of the Ministries
Entrance 13
010000 Astana
Kazakhstan

By courier

116/2010
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**Arbitration V (116/2010): 1. Anatolie Stati 2. Gabriel Stati 3. Ascom Group S.A
4. Terra Raf Trans Traiding Ltd. ./ The Republic of Kazakhstan**

We refer to our letter, dated 5 August 2010.

You are hereby reminded to submit an Answer in accordance with Article 5 of the SCC Rules and, where appropriate, a Power of Attorney. The Answer shall be submitted by 10 September 2010, at the latest.

Please be informed that failure to submit an Answer does not prevent the arbitration from proceeding.

Yours sincerely,

ARBITRATION INSTITUTE OF THE
STOCKHOLM CHAMBER OF COMMERCE

Natalia Petrik
Legal Counsel
natalia.petrik@chamber.se

Copy (by e-mail):
Reginald R. Smith
Kenneth R. Fleuriet
Adrian Bulboaca

Mailing address	Visiting address	Phone	Fax	E-mail	Website
Box 16050 SE-103 21 Stockholm Sweden	Jakobs Torg 3 Stockholm Sweden	+46 8 555 100 50	+46 8 566 316 50	arbitration@chamber.se	www.sccinstitute.com

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

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Civil Action No. 1:14-cv-1638-ABJ

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EXHIBIT 5



* 3 1 0 8 1 0 T S E T S E T S 0 6 A 0 3 *

DELIVERY SHEET

DELIVERY DATE: 31/08/2010 TIME: 09:20 ROUTE: TS06 A COURIER: 0010

Service Area: TSE / TSE / kz40

The consignee declares that he/she has received the shipment(s) in good order and condition, and that he/she accepts our terms and conditions as defined on the airwaybill attached to the shipment

Sheet: 3 of 5

No.	Consignee/Contact Name	AWB/PieceID	Pcs CKPT	Orig: Prod	Wt (KG) PU Date	Amount	Invoice	Name/Signature
1	KMG KASHAGAN B.V. / AB DUAKHITOVA GULDANA	4502545085 JD013038022660018472	1/1	AMS D	0.0 25.08.10	OK	16.35	Сидоров
2	COMMITTEE OF WA / MS K MUSINA	3218591320 JD013045412390018431	1/1	ZTZ X	0.0 25.08.10	OK	14.05	Сидоров
3	MINISTRY /	2931636782 JD013044462320041336	1/1	ARN D	0.0 27.08.10	OK	10.20	Сидоров
4	KOMITET / MIHALCHENKO	2635388076 JD013045410980043740	1/1	KYZ D	0.0 25.08.10	OK	16.30	Сидоров
5	JSC MNK KAZIMJAN TENIZ	1273858601 JD013042058760047036	1/1	OSL D	0.0 26.08.10	CA		
6	MIN OF INDUSTRY / UZHK ENOV	1754943245 JD013045410980027966	1/1	TBS X	0.0 25.08.10	OK	11.40	Сидоров
7	KTG / ZHUMIN K.R.	9442876774 JD013045410980091709	1/1	DME D	0.0 27.08.10	OK	17.08	Сидоров
8	TOO MOSKOVSKAYA INVEST ITSIONNO-STRO / VOROBEVA	3441028223 JD0130454109800350674	1/1	MOV D	0.0 26.08.10	OK	16	Сидоров
9	ALTYNMEI / ZHOLDOSH	8225423802 JD013045410980062113	1/1	DME X	0.0 26.08.10	OK	14.00	Сидоров
10	KBV / MAIRA TURYSBEKOV A	1506209370 JD012034205150032958	1/1	AMS D	0.0 24.08.10	CA		
	SARYARKA ENERGY LTD / BAKHTIYOR SAFIYAZOV	8243859016 JD013044895760054422	1/1	EIN D	0.0 27.08.10	OK	16.40	Сидоров
12	SUMITOMO CORPORATION A STANA OFFICE / ASTZZ	6589308852 JD012042380970013497	1/1	TYO D	0.0 24.08.10	OK		Сидоров
13	KOMITET / KALABAYEV	1427289942 JD013045476700024318	1/1	ALA N	0.0 28.08.10	OK	10.30	Сидоров
14	RGP KAZGIDROMET / IBRA EV	2871244480 JD013045410980095537	1/1	SCO N	0.0 27.08.10	OK	16.35	Сидоров
15	PROKURATURA / REC	2870813565 JD013045410980097161	1/1	GUW N	0.0 27.08.10	OK	14.35	Сидоров
16	KTG / REC	1427002846 JD013045410980097599	1/1	GUW N	0.0 27.08.10	OK	17.08	Сидоров

**IN THE UNITED STATES DISTRICT COURT
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EXHIBIT 6



ARBITRATION INSTITUTE
OF THE STOCKHOLM CHAMBER OF COMMERCE

Stockholm, 13 September 2010

The Republic of Kazakhstan

Att: Ministry of Justice of the Republic
of Kazakhstan
House of the Ministries
Entrance 13
010000 Astana
Kazakhstan

By registered mail

116/2010

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**Arbitration V (116/2010): 1. Anatolie Stati 2. Gabriel Stati 3. Ascom Group S.A
4. Terra Raf Trans Traiding Ltd. ./ The Republic of Kazakhstan**

Please find enclosed a letter from Anatolie Stati, Gabriel Stati , Ascom Group S.A and Terra
Raf Trans Traiding Ltd. dated 13 September 2010.

Yours sincerely,

ARBITRATION INSTITUTE OF THE
STOCKHOLM CHAMBER OF COMMERCE

Christina Franzén-Papazov
Assistant
christina.franzen-papazov@chamber.se

Copy (by e-mail):
Reginald R. Smith
Kenneth R. Fleuriet
Adrian Bulboaca

Mailing address	Visiting address	Phone	Fax	E-mail	Webbsite
Box 16050 SE-103 21 Stockholm Sweden	Jakobs Torg 3 Stockholm Sweden	+46 8 555 100 50	+46 8 566 316 50	arbitration@chamber.se	www.sccinstitute.com

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INTERNATIONAL LLP

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75008 PARIS
France

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Fax: +33 (0)1 73 00 3959
www.kslaw.com

Kenneth R. Fleuriot

September 13, 2010

Ms. Annette Magnusson
Secretary General
Arbitration Institute of the
Stockholm Chamber of Commerce
Jakobs Torg 3
P.O. Box 16050
SE-103 21 Stockholm
Sweden

via courier and email

Re: Arbitration V (116/2010): *Anatolie Stati, Gabriel Stati, Ascom Group S.A., and Terra Raf Trans Traiding Ltd v. the Republic of Kazakhstan*

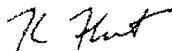
Dear Ms. Magnusson:

On behalf of our clients Anatolie Stati, Gabriel Stati, Ascom Group S.A., and Terra Raf Trans Traiding Ltd., we note that Kazakhstan has failed to submit an Answer to our clients' Request for Arbitration by its extended deadline of September 10, 2010. Kazakhstan previously failed to submit an Answer by its original deadline of August 26, 2010.

In accordance with Article 5(3) of the Arbitration Rules of the Stockholm Chamber of Commerce, "failure by the Respondent to submit an Answer shall not prevent the arbitration from proceeding." Pursuant to Article 13(3) of the Arbitration Rules, we hereby request that the Board of the Arbitration Institute of the SCC appoint an arbitrator on behalf of Kazakhstan so that the arbitration may proceed. We further request that the Board confirm Paris, France, as the seat of arbitration, as proposed in our clients' Request for Arbitration.

Thank you for your assistance with these matters.

Sincerely,



Reginald R. Smith
Kenneth R. Fleuriot

cc: Mr. Adrian Bulboaca

Cabinet de Solicitors and Registered Foreign Lawyers
Membres de la Law Society of England and Wales
Inscrit au Barreau de Paris en application de la Directive 98/5/CE

**IN THE UNITED STATES DISTRICT COURT
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V.

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EXHIBIT 7



SUEDE SWEDEN

Case 1:15-mc-00681-P1 Document 19-1 Filed 04/27/15 Page 17 of 17

MOTTAGNINGSBEVIS ADVISORY OF DELIVERY

Inlämningsställe Office of posting

Datum Date

Adressatens namn eller firma Name of the addressee or firm

THE REPUBLIC OF KAZAKHSTAN

AIR MINISTRY OF JUSTICE OF REP. KAZAKHSTAN

Försändelsen Nature of item

☒ Rekommenderat Registered mail

Inlämningsnummer Number of item

RR

SE

Fylls i på adressorten To be filled in at the place of destination

Försändelsen har The item has

☐ lämnats ut been delivered

Datum och underskrift Date and signature *

10/10/15 [Signature]

* This advice may be signed by the addressee or, if the regulations of the destination so provide, by another authorized person or by the official of the office of destination.



On postal service

Datumstämpel av serviceställe som
återsänder mottagningsbeviset
Stamp of the office returning the adviceFylls i av avsändaren
To be filled in by the sender

Återsänds till Return to

Arbitration Institute of the
Stockholm Chamber of Commerce

P.O. Box 10350

SE-103 21 Stockholm
Sweden